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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

**DISCOVERY MATTER**

Case No. 18-cv-06753-PJH

This Document Relates To:  
ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME OF  
MOTION FOR RELIEF FOR GSR  
HOLDINGS, INC.**

STIPULATED [PROPOSED] ORDER TO EXTEND TIME TO OBJECT TO THIRD PARTY DISCOVERY  
CASE NO. 18-cv-06753-PJH

1 Pursuant to Civ. L.R. 6-2, Lead Plaintiff Bradley Sostack (“Plaintiff”), Defendants Ripple  
2 Labs Inc, XRP II, LLC, and Bradley Garlinghouse (collectively, “Defendants”), and GSR  
3 Holdings, Inc. (“GSR”) hereby stipulate as follows:

4 **WHEREAS**, on April 28, 2022, the Court ordered that Defendants produce all documents  
5 and written discovery produced in *Securities and Exchange Commission v. Ripple Labs, Inc.*, 20  
6 Civ. 10832 (AT), S.D.N.Y) (the “SEC Action”) and that Plaintiff must provide notice to all  
7 relevant third parties who have not previously consented to production within seven days of the  
8 Order (the “April 28, 2022 Order”);

9  
10 **WHEREAS**, in the April 28, 2022 Order, the Court also ordered that any third party who  
11 does not consent to production must notify both Plaintiff and Defendants of their intent to object  
12 within fourteen days of receipt of the notice and must file any motion for relief within twenty-one  
13 days of receipt of such notice;

14 **WHEREAS**, on May 4, 2022, Plaintiff provided notice of the April 28, 2022 Order to  
15 GSR, a third party in this matter who produced documents in the SEC Action;

16 **WHEREAS**, GSR timely notified Plaintiff and Defendants of its intent to object to  
17 production by May 18, 2022, and any motion for relief is due on May 25, 2022;

18 **WHEREAS**, Plaintiff and GSR are in the process of meeting and conferring about the  
19 documents that GSR will produce to Plaintiff pursuant to the April 28, 2022 Order;

20 **WHEREAS**, the parties request to extend the May 25, 2022 deadline for GSR to seek relief  
21 from the Court to allow the parties to continue to meet and confer productively; and

22 **WHEREAS**, granting this extension is not expected to affect the schedule for the matter.

23 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff,  
24 Defendants, and GSR, through their respective counsel, that:  
25  
26  
27  
28

1. GSR's deadline to move the Court for relief from its April 28, 2022 Order is extended until June 2, 2022.

Dated: May 24, 2022

By: /s/ Nicholas N. Spear  
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**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: May 24, 2022

/s/ Nicholas N. Spear

Nicholas N. Spear